

Mr. Rich Ward  
EGS Easy Heat, Inc.  
31977 US 20 East  
New Carlisle, IN 46552

Dear Mr. Ward:

Re: Exempt Construction and Operation Status,  
141-12467-00083

The application from EGS Easy Heat, Inc., received on July 6, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following manufacturing and assembling coated heating wire products, to be located at 31977 US 20 East, New Carlisle, Indiana, is classified as exempt from air pollution permit requirements:

- (a) Two (2) Electrically Heated G-mat machines, Throughput: 1887 feet of PVC wire processed per hour, Referred to as #0011 and #0012,
- (b) Eight (8) Plastic injection molders, Throughput: 13.62 pounds of processed PVC compounds per hour, Referred to as #0017, #0069, #0082, #0083, #0088, #0106, #0121, #0122.
- (c) Twenty (20) Natural Gas Heaters, Capacity of each: 0.052 MMBtu per hour.
- (d) One (1) Natural Gas Heater, Capacity: 0.20 MMBtu per hour.
- (e) Four (4) Natural Gas Heaters, Capacity of each: 0.30 MMBtu per hour.
- (f) One (1) Natural Gas Heater, Capacity: 0.165 MMBtu per hour.
- (g) Two (2) Natural Gas Heaters, Capacity of each: 0.10 MMBtu per hour.
- (h) welding and brazing operations

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

- (2) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the welding, brazing, injection molding, and pvc molding shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

This existing source has been issued a Registration (R-141-3766-00083) on December 21, 1994. This source was issued this registration based on the old Article 2 rules, which had a ton per year and a pound per day threshold for registered sources. The current Article 2 rules are based on tons per year thresholds only, and under the current rules, the source is an exempt source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

sah

cc: File - St. Joseph County  
St. Joseph County Health Department  
Air Compliance - Rick Reynolds  
Northern Regional Office  
Permit Tracking - Janet Mobley  
Technical Support and Modeling - Michele Boner  
Compliance Data Section - Karen Nowak

## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for Exempt Emission Units**

#### **Source Background and Description**

**Source Name:** EGS Easy Heat, Inc.  
**Source Location:** 31977 US 20 East, New Carlisle, IN, 46552  
**County:** St. Joseph  
**SIC Code:** 3643  
**Operation Permit No.:** 141-12467-00083  
**Permit Reviewer:** Sherry Harris

The Office of Air Management (OAM) has reviewed an application from EGS Easy Heat, Inc. relating to the construction and operation of manufacturing and assembling coated heating wire products.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) Electrically Heated G-mat machines, Throughput: 1887 feet of PVC wire processed per hour, Referred to as #0011 and #0012,
- (b) Eight (8) Plastic injection molders, Throughput: 13.62 pounds of processed PVC compounds per hour, Referred to as #0017, #0069, #0082, #0083, #0088, #0106, #0121, #0122.
- (c) Twenty (20) Natural Gas Heaters, Capacity of each: 0.052 MMBtu per hour.
- (d) One (1) Natural Gas Heater, Capacity: 0.20 MMBtu per hour.
- (e) Four (4) Natural Gas Heaters, Capacity of each: 0.30 MMBtu per hour.
- (f) One (1) Natural Gas Heater, Capacity: 0.165 MMBtu per hour.
- (g) Two (2) Natural Gas Heaters, Capacity of each: 0.10 MMBtu per hour.

#### **New Emission Units and Pollution Control Equipment**

The application includes information relating to the prior approval for the construction and operation of the following equipment.

- (a) welding and brazing operations

## **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) R 141-3766-00083, issued on December 21, 1994, the source was issued this registration based on the old Article 2 rules, which had a ton per year and a pound per day threshold for registered sources. The current Article 2 rules are based on tons per year thresholds only, and under the current rules the source is an exempt source, which will supersede the existing registration.

All conditions from previous approvals were incorporated into this permit.

## **Stack Summary**

Based on the information submitted in a letter dated November 18, 1994 from Gordon Unger, Warehouse and Traffic Manager from Easy Heat Incorporated, there are no stacks at the facility.

## **Enforcement Issue**

There are no enforcement actions pending.

## **Recommendation**

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 06, 2000, with additional information received on July 27, 2000.

## **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (pages 1 through 3.)

## **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	1.24
PM-10	1.24
SO <sub>2</sub>	0.0
VOC	2.48
CO	.4
NO <sub>x</sub>	7.67

HAP's	Potential To Emit (tons/year)
hexane	.02211
formaldehyde	.0009214
TOTAL	.02303

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 25 tons per year for. Specifically, they are less than five (5) for PM, and PM-10, less than ten (10) for SO<sub>x</sub>, less than twenty-five (25) for CO, less than five (5) for VOC, and less than ten (10) for NO<sub>x</sub>. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.

### County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD),

326 IAC 2-2 and 40 CFR 52.21.

- (b) St. Joseph County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

This existing source is an exempt source and with the addition of the emission units under this modification, the source status will remain as an exempt source.

Pollutant	Emissions (ton/yr)
PM	1.24
PM10	1.24
SO <sub>2</sub>	0.0
VOC	2.48
CO	.4
NO <sub>x</sub>	7.67

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the existing approval R141-3766-00083

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit CP-141-12467-00083, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,  
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and  
(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-6 (Emission Reporting)**

This source is located in St. Joseph County and the potential to emit VOC and NOx is less than ten (10) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

#### **326 IAC 5-1 (Opacity)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **State Rule Applicability - Individual Facilities**

#### **326 IAC 6-3-2 (Process Operations)**

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the welding, brazing, injection molding, and pvc molding shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This source will emit levels of air toxics less than those, which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

## **Conclusion**

The *welding, brazing, pvc molding, plastic coating, and heating operation* of this manufacturing and assembling of coated wire products facility shall be subject to the conditions of the attached proposed Exemption 141-12467- 00083.